

MELINDA HAAG  
United States Attorney

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RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

LHK

SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHERYL SAVAGE

Defendant.

C R No. 11 0728

VIOLATION: 26 U.S.C. § 7201 - Attempt  
to Evade or Defeat Tax

SAN JOSE VENUE

HRL

INDICTMENT

The Grand Jury charges:

COUNT ONE: (26 U.S.C. § 7201 - Attempt to Evade or Defeat)

On or about October 13, 2005, in the Northern District of California, the defendant

CHERYL SAVAGE,

a resident of Monterey, California, did willfully attempt to evade and defeat a part of the income tax due and owing by her to the United States of America for the calendar year 2004, by preparing and causing to be prepared, and by signing and causing to be signed, a false and fraudulent U.S. Individual Income Tax Return, Form 1040, which was filed with the Internal Revenue Service. In that false income tax return, SAVAGE stated that her taxable income for the calendar year was \$76,122, and that the amount of tax due and owing thereon was \$29,959. In fact, as SAVAGE then and there knew, her taxable income for the calendar year was in excess

INDICTMENT

1 of the amount stated on the return, and, upon the additional taxable income an additional tax was  
2 due and owing to the United States of America.

3 All in violation of Title 26, United States Code, Section 7201.

4 COUNT TWO: (26 U.S.C. § 7201 - Attempt to Evade or Defeat Tax)

5 On or about October 12, 2006, in the Northern District of California, the defendant  
6  
7 CHERYL SAVAGE,  
8 a resident of Monterey, California, did willfully attempt to evade and defeat a part of the income  
9 tax due and owing by her to the United States of America for the calendar year 2005, by  
10 preparing and causing to be prepared, and by signing and causing to be signed, a false and  
11 fraudulent U.S. Individual Income Tax Return, Form 1040, which was filed with the Internal  
12 Revenue Service. In that false income tax return, SAVAGE stated that her taxable income for  
13 the calendar year was \$181,609, and that the amount of tax due and owing thereon was \$61,947.  
14 In fact, as SAVAGE then and there knew, her taxable income for the calendar year was in excess  
15 of the amount stated on the return, and, upon the additional taxable income an additional tax was  
16 due and owing to the United States of America.

17 All in violation of Title 26, United States Code, Section 7201.

18 COUNT THREE: (26 U.S.C. § 7201 - Attempt to Evade or Defeat Tax)

19 On or about October 13, 2007, in the Northern District of California, the defendant  
20  
21 CHERYL SAVAGE,  
22 a resident of Monterey, California, did willfully attempt to evade and defeat a part of the income  
23 tax due and owing by her to the United States of America for the calendar year 2006, by  
24 preparing and causing to be prepared, and by signing and causing to be signed, a false and  
25 fraudulent U.S. Individual Income Tax Return, Form 1040, which was filed with the Internal  
26 Revenue Service. In that false income tax return, SAVAGE stated that her taxable income for  
27 the calendar year was - \$442,753 (a loss), and that the amount of tax due and owing thereon was  
28 \$6,714. In fact, as SAVAGE then and there knew, her taxable income for the calendar year was  
in excess of the amount stated on the return, and, upon the additional taxable income an

1 additional tax was due and owing to the United States of America.

2 All in violation of Title 26, United States Code, Section 7201.

3 A True Bill

4  
5 Dated: Oct 4, 2011

Julian Mauri  
FOREPERSON

7 MELINDA HAAG  
8 United States Attorney

9 M. Kane

10 MIRANDA KANE  
11 Assistant United States Attorney  
Chief, Criminal Division

12 Approved as to Form

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14 Cynthia Stier

15 CYNTHIA STIER  
16 Assistant United States Attorney  
17 Tax Division  
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